Dennis Baird
10/01/2004 11:58 AM
To: comments-northern-nezperce-red-river@fs.fed.us
cc:
Subject: Red Pines DEIS comments

Dear friends:

Thank you for the chance to comment on the DEIS and on this important project.

The area being addressed by this plan is generally well-suited to logging, which has become the dominant use in the area. But it has also been very heavily managed for that use, with rather mixed results. The past logging in this area has done nothing to retard pine beetle population growth, and one could perhaps argue that it has increased the beetle risk to the remnant trees.

It would also be tough to argue that this part of the NPNF needs more openings, since an examination of recent air photos of this part of the forest clearly shows that opening are the dominant feature of the landscape.

I think that the DEIS does an inadequate job of examininbg two large uncertainties. The first is: what is the proper silvicultural method to use to both account for insect damage in stands of the type that exist in Red River, and perhaps just as importantly, IS there a method available to account for past logging problems and changes in insect trends caused by external factors such as global warming. The DEIS does a pretty good job in explaining how this piece of our lands got to where it now is, but makes a less well explained leap toward doing something.

Response 12-1. Silviculture, insects, method to determine trend

Treatments such as thinning to reduce stand densities, as well as stand regeneration treatments such as shelterwood or clearcutting are acceptable silvicultural practices in response to insect damage in forest stands, notably lodgepole pine dominated stands that are present in the analysis area.

Past logging has probably contributed little to the epidemic population of mountain pine beetles in the Red Pines analysis area, at least partly because lodgepole pines were not the most desired trees removed in the past. Patch fragmentation and openings may have slowed the progression of the beetles somewhat, though it would be speculative to argue that these have had a significant effect as the beetles are active throughout the project area and beyond.

Project design and mitigation measures would be implemented to minimize impacts associated with past logging practices, such as sediment delivery to aquatic systems, or loss of soil productivity from soil compaction and displacement (DEIS, pages II-10 through II-18).

The most evident insect affecting trees in the project area at this time is mountain pine beetle, which has been at epidemic population levels for several years, causing widespread mortality to both lodgepole and ponderosa pines. Mountain pine beetle is a native insect, and is a natural disturbance agent affecting forest succession. While it is recognized that temperature is a factor influencing the survival of the beetles and susceptibility lodgepole pines to attack, it would be speculative to argue that global warming has had a measurable effect on the epidemic population of pine beetles currently present in the project analysis area.
See purpose and need (DEIS; pages I-2, I-3, and Forest Plan consistency discussion pages I-4, I-5) The purpose and need for action is to treat existing and potential fuels in order to reduce the effects of large scale wildfire improve the safety and effectiveness of firefighters in fire suppression activities, and to contribute to the economic and social well-being of residents and visitors.
Also see DEIS, pages III-137 through III-138 (cover types and structure) and III-142-158 for discussion of existing condition and effects.

An appendix roughly called "Red River silviculture, the big picture" would be of real value to readers of this document.

Response 12-2. Appendices. Silviculture.
See FEIS, Landscape Ecology Section 3.8 and Response 4-8.

But the biggest problem is the near certainty that the proposed package of watershed repairs is not up to the task, or, as the errata sheet points out, "upward trend requirements would not apply." Well, they need to. Not being a hydrologist, I'm not certain of how to cure what is in fact a real problem with all the action alternatives. One obvious choice would be to reduce the amount of timber being harvested, but there are probably other choices available as well.

Response 12-3. Alternative, water quality, fish habitat, upward trend.

A new alternative (E) was developed for the FEIS, based on comments received on the DEIS. Alternative E is responsive to the concern of upward trend in aquatic habitat carrying capacity. It included a reduction in short term impacts associated with fuel reduction and temporary road construction and an increase in long term watershed improvements associated with road decommissioning and soil restoration.

The DEIS already does propose a fairly energetic effort at watershed restoration (although with the usual problem: how, exactly, is the timing and funding of these projects linked to the tree removal part of the project?).

Response 12-4. Implementation, funding, timing.

The Forest Service is committed to concurrent and timely implementation of the watershed restoration activities associated with this project. Funding will be aggressively sought through a variety of sources, including Forest Service appropriated funds.
See Response 14-48.

Maybe there is a need to go back to the watershed improvement drawing board to consider a much broader range of efforts to improve the streams? A better mind than mine would be needed to do so, but the NPNF has a good and enviable record of knowing how to fix water quality problems, so there is reason for optimism.

Response 12-5. Alternatives, water quality, watershed improvements.
See Response 2-2 and Response 12-3.

But one thing is sure: the EIS must include a thorough and honest effort to improve water quality and generate upward trends at the same time as tree removal is being done. The two just have to go together.

Response 12-6. Water quality, upward trend, same time as activities.
See Responses 12-3, 12-4, 12-5 and 2-2.
See also Appendix H of the FEIS.

The DEIS is well organzied, has some fine and useful maps, and does a very good job at identifying impacts on other forest resources.

Response 12-7. Comment Acknowledged.

Inclusion of a map showing existing openings--and there are LOTS of them--would be a good idea.

Response 12-8. Appendices. Silviculture, GIS.
Comment Acknowledged.
See FEIS, Map 19, for a display of past harvest and existing roads in the Red River watershed.

Sincerely,

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